

October 31, 2011

United States Bankruptcy court
Southern District of New York

RE: Lehman Brothers Holdings Inc., et al., Debtors
Chapter 11 Case No. 08-13555 (JMP)
OBJECTION TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM

Name of Claimant : FUNG, Grace Sin Yu
Claim Number : 36560
Date Filed : 10/6/2009
Debtor : 08-13555
Classification : Unsecured
Amount : US\$ 100,000
Address : Flat B, 24/F, Block 7, Cavendish Heights, 33 Perkins Road,
Jardine's Lookout, Hong Kong
Telephone Number : 852-2815-5195
Email : gracesyfung@gmail.com

I object to the disallowance and expungement to my claim based on the following ground:

1. I have purchased the perpetual bond based on the fact that it was guaranteed by LBHI so that no matter what happens to the issuer, the guarantor will still be liable. I have not had a chance to read the prospectus before buying the perpetual bond and was not aware of how it was drafted. Even assuming the guarantee stated that it would terminate upon dissolution of the issuer, such termination should be without prejudice to the liabilities already accrued against the guarantor i.e. the total amount of the debt. It was exactly to guard against the situation when the issuer becomes dissolved or is otherwise insolvent that a guarantor is required, so it would repel against common sense to say that the guarantee would be terminated upon dissolution of the issuer to the extent that even liabilities already accrued would be expunged.
2. Based on the above, the guarantee had not been terminated. As to the ranking of my claim as a creditor, this will be determined in accordance with the applicable law and legal document but there is no reason for my claim to be reclassified as equity interest. To state that the debt is a subordinated debt is one thing, but to re-classify the nature of the claim from a "debt" to "equity" is a fundamentally different matter.

Lastly, I would like to participate in the hearing telephonically as I reside outside of the United States. Please provide telephonic participation instructions to me via email or letter prior to the hearing date Nov 30, 2011.

Sincerely,


FUNG, Grace Sin Yu

